

Mr. Christopher M. Mathieson  
Bomarko, Inc.  
P. O. Box 1510  
Plymouth, IN 46563

Re: 099-15491  
Second Administrative Amendment to  
Part 70 T 099-7713-0002

Dear Mr. Mathieson:

Bomarko, Inc. was issued a Part 70 permit on March 11, 1999, for a stationary waxed and coated paper and foil roll and sheeted stock manufacturing operation. A letter requesting changes in the permit was received on January 23, 2002. The changes are related to the addition of one (1) flexographic printing press. In addition, the name of an existing flexographic printing press will be changed.

According to 326 IAC 2-7-10.5(d)(9) (Part 70 permits: source modifications), a source modification may be used for "a modification that has the potential to emit greater than the thresholds under subdivision (4) that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units". A source modification cannot be used for the addition of the printing press, since the potential to emit of the new printing press is less than 10 tons per year, which is below the threshold in 326 IAC 2-7-10.5(d)(4). According to 326 IAC 2-7-11(a)(8), an administrative amendment may be used for a modification that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Since the source has existing flexographic printing presses, the addition of a new press of the same type, with a potential to emit of less than 10 tons per year will not trigger a new applicable requirement or violate a permit term. Therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strike-out~~ to show deletions and **bold** to show additions):

1) The facility description in Section A.2 is amended as follows:

8. one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
9. one (1) flexographic printing press, identified as ~~PW2~~ **BFP15**, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
10. **one (1) flexographic printing press, identified as BFP16, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches; and**
101. one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

2) The facility description in Section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (2) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (3) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (4) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (5) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 800 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);
- (6) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (7) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (8) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1); **and**
- (9) one (1) flexographic printing press, identified as ~~PW2~~ **BFP15**, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches; **and**
- (10) **one (1) flexographic printing press, identified as BFP16, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Marshall County  
U.S. EPA, Region V  
Marshall County Health Department  
Northern Regional Office  
Air Compliance Section Inspector- Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Bomarko, Inc.  
1955 North Oak Road  
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-7713-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Date Issued: March 11, 1999

First Minor Permit Modification No: 099-13815  
First Administrative Amendment No: 099-14912

Date Issued: March 8, 2001  
Date Issued: October 30, 2001

Second Administrative Amendment No.: 099-15491	Affected Pages: 6, 29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

- (9) one (1) flexographic printing press, identified as BFP15, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (10) one (1) flexographic printing press, identified as BFP16, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches; and
- (11) one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- 1. Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
  - (a) one (1) hot water boiler, rated at 0.164 MMBtu per hour;
  - (b) two (2) hot water boilers, each rated at 0.66 MMBtu per hour;
  - (c) one (1) boiler, rated at 2.14 MMBtu per hour;
  - (d) one (1) hot water boiler, rated at 2.58 MMBtu per hour; and
  - (e) one (1) boiler, rated at 1.5 MMBtu per hour.
- 2. Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
  - (a) one (1) Safety Kleen cold parts cleaner.
- 3. Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (6) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (7) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (8) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
- (9) one (1) flexographic printing press, identified as BFP15, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches; and
- (10) one (1) flexographic printing press, identified as BFP16, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of Presses 1-2-P3, 1-2-P4, 1-2-P5, 1-2-P7, 1-2-P8, and 1-2-P9 employing solvent-containing ink unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (c) the owner or operator installs and operates:
  - (1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
  - (2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or

